East Lothian Council

LOCAL DEVELOPMENT PLAN 2

Background Paper - Town Centres and Retailing

Issue No 016

Context: NPF Spatial Strategy, NPF 4 Policy 27 City, Town, Local and Commercial Centres, Policy 28 Retail

This section deals with East Lothian's town centres and local centres and any retail development in general. With particular focus on:

- Town centre hierarchy
- Health of town centres
- Health and well-being
- Future retail capacity
- Residential in town centres

LINKS TO EVIDENCE

ELC 411	Town Centre Audit 2023 (East Lothian Council) Available to reporter on request
ELC 412	Retail Capacity Study 2021 (Roderick Mclean for Ryden) Available to Reporter on request
ELC 413	Footfall up to 2022 (PMRS) Available to Reporter on request
ELC 427	Vacant and Derelict Land 2023 (East Lothian Council) Available to reporter on request
ELC 415	Scottish Retail consortium – national trends (www.brc.org.uk/src/)
ELC 051	East Lothian Local Economy Strategy 2024 Search results | East Lothian Council

SUMMARY OF EVIDENCE

Town Centre Hierarchy

There are currently 6 designated town centres and 17 Local Centres in East Lothian, both afforded the same level of protection in the sequential approach, under current Local Development Plan (Policy TC1).

The current town centre boundaries encompass a wide variety of uses, however, they do not give much focus on opportunities to concentrate retail and non-retail service uses together in primary pitches. The advantage of establishing 'core commercial frontage areas' is that shoppers and visitors are presented with the town's retail and non-retail service offer in a relatively small area providing the best choice and increased generation of footfall. In particular Musselburgh and Prestonpans could be truncated – or core commercial frontages could benefit some centres.

Commercial centres are low on the hierarchy of preference under sequential test and do not need planning policy protection to the extent of town centres and local centres.

Vacancy Rates
East Lothian has below national average vacancy rates for all 6 of the main town centres.

Footfall in each town centre is rising again, following the Covid pandemic. National retail trends indicate the probability that shoppers will visit fewer centres in the future and weaker parts of town centres are unlikely to meet future market demand. The trend is for shoppers to visit the largest centres, malls and retail parks, combined with higher levels of online shopping (Ryden, 2021).

Whilst class 1 uses predominate (de-defined as Class 1A in 2023), some centres host concentrations of hot food takeaways or other sui generis uses, such as book makers, often these are within the central shopping area, and often these are in our more disadvantaged areas – such as Tranent and Prestonpans, some are close to schools e.g. Tranent.

Site opportunities for significant new retail in the 6 town centres are very limited.

Health and well-being
Concentrations of certain uses are found within some East Lothian town centres. It can be surmised that some concentrations e.g. shops selling 'unhealthy' foods, in close proximity to schools, can be harmful to the well-being of the community. However, there is no data available in East Lothian at the town centre level to allow for quantitative correlation. This is something that will be sought going forward, through collaborative working with the NHS.

Future Retail Capacity
The forecast spare convenience expenditure capacity to 2030 ranges from none to £10 million (which is not large). It would support a notional additional 700 sqm net of convenience floorspace. Scope for servicing further new convenience floorspace will mostly be in the form of trade diversion from existing stores, to improve the quality, range and choice of convenience stores generally.

Comparison expenditure is projected to rise. Forecast spare expenditure capacity in East Lothian to 2030 is within the range of £18 million to nearly £44 million. This could support between 3500 – 7400 sq m net of comparison retail floorspace. Realisation of this potential will depend on provision of an attractive and continually improving offer from retailers in East Lothian. Without this, expenditure leakage will almost certainly increase further and there will be more online spending.

There are currently three drive through facilities in East Lothian, built and operating, and a further four units with planning permission in place. Collectively, these are spread geographically across East Lothian with two in Dunbar, two in Haddington, two at A1 roadside (outside Macmerry) one on the edge of Musselburgh (A1 roadside). Future market demand will be tested through a Call for Sites process in 2024 and consideration will be given to any proposed drive-through locations with a particular focus on impacts and effects on the existing road network, climate impact, the existing retail offer and distribution and compatibility of drive throughs with the wider area. Consideration must also be given to the health and well-being of local communities with awareness to the offer of healthy food and drink in the district and on sale within the town and local centres, particularly those centres, and locations, within close proximity to schools.

Residential in Town Centres
East Lothian's town centres are small, residential use is currently encouraged, but not within the main shopping areas. All 6 town centres serve a residential hinterland, much of which is accessible within 20 minutes. Where there is capacity or opportunities to develop new housing and flats without compromising active use of ground floors and public spaces, this has been supported. The Housing background paper deals with housing need,

demand and affordability and will look at gaps in supply relative to demand, including within town centres. There will be limited scope for new housing in town centres and it will not be appropriate or possible to set part of the housing land requirement aside for town centre allocations. Delivery of any opportunities in these areas will be better served through a policy framework which protects the primacy of retail while providing the flexibility to accommodate residential opportunities.

SUMMARY OF STAKEHOLDER CONSULTATION

The Statement of Community Involvement details the process and the comments received. Key comments received with respect to town centres and retailing are highlighted below:

General Public

- 86% of respondents want no new out-of-town retail development
- Support for enhancing existing town centres 77%
- 76% of respondents support restriction of some uses in town centres, with most support for restricting hot food take-aways and bookmakers

Children and Young People

- Only 9% of secondary aged respondents think there are good shops in their area, but 12% think there are good places to buy food and drink.
- 25% of respondents buy their lunch form the high street or local shops – this is primarily unhealthy type food (72% purchase fast food, crisps, sweets or juice)
- In secondary schools, using the Place Standard tool, young people scored schools, libraries, shops and services as 'better than ok' (5)
- Primary aged children like having sports facilities, parks, school, shops and community centres close by. Not having to drive to these facilities is important. They would like to see a variety of shops and cafes in their local areas.

WHAT THIS MEANS FOR THE PROPOSED PLAN? WHAT ARE THE KEY ISSUES FOR THE LDP TO ADDRESS, FROM POLICY ANALYSIS?

The existing town centre boundaries encompass a wide range of town centre uses, however without defined core commercial frontages, the retail offer in some centres is quite dispersed e.g. Musselburgh and Prestonpans. Furthermore, this can lead to clustering of non-shop uses within core areas – see below. Young people are particularly keen to see improvements in the shops in their area with only 13% of respondents believing there are good shops in the area that they live.

- **Retain town centre boundaries to include and encourage a wide range of uses. Consider the introduction of core commercial frontages to each town centre (primarily permitting use classes 1,2 and 3). Identify commercial centres (out of /edge of town) – these will sit lower in sequential approach.**

Vacancy rates remain stable, footfall is increasing since the pandemic, but some centres have concentrations of non shopping uses both within the core commercial areas, and sometimes close to schools. Public engagement saw strong support for the restriction of some uses, primarily hot food take-aways and bookmakers (there is support for this in Policy 27 of NPF4). We have found through our survey, that a large proportion of those secondary aged children utilising the high street or local shops for lunch, are buying less healthy foods/drinks.

- **Restrict non retail uses where clustering is impacting the well-being of the community**
- **Identify areas where proposals for healthy food and drink outlets can be supported**

Very little spare convenience expenditure forecast to 2030. Planned local centres, including at Blindwells, can accommodate this spare expenditure. There are few site opportunities within existing town centres. 86% of adult respondents to recent engagement want no new out-of-town retail development. Children too like having shopping facilities close by.

- **Limited town centre opportunities for new retail development, there is limited surplus expenditure. Focus on regeneration and improvement, including redevelopment and improvement to urban realm where appropriate.**

There is significant spare retail comparison expenditure to 2030, plus leakage to outside of East Lothian is currently very high (70%). However, there are no large town centre opportunity sites and 86% of adult respondents to recent engagement want no new out-of-town retail development.

- **Ensuring a continued programme of maintenance and improvement to the town centres in East Lothian is the best route to support retailing and services in these centres.**
- **Call for sites will present market demand and assessment will be required on any retail sites and sites promoted for drive-through facilities.**

AREAS WHERE THERE IS AGREEMENT OR DISPUTE ON ISSUES AND POSSIBLE APPROACHES.

There is significant public support for no new out of town retail in East Lothian – this correlates with the findings of the Retail Capacity Study. There is also strong support for restricting some uses within town centres, our own evidence demonstrates some accumulations and geographical concentrations of some less desirable uses, such as hot food takeaways and bookmakers. A large proportion of children that responded are purchasing less healthy foods during their lunch break.

However, children and young people would like to see a greater variety of shops and leisure facilities, reducing the need to travel further afield and there is scope for claw back on comparison expenditure, as identified in the Retail Capacity Study. Unfortunately, there is limited scope for development within the existing town centres.

There were no disputes raised by Key Agencies on town centres and retailing.

LINKS TO EVIDENCE

Key Strategies and Data Sources		
Ryden (2021) Combined Commercial Needs study, including Retail Capacity Study by Roderick MacLean	Research, analysis and findings on retail capacity in East Lothian	No link as yet
East Lothian Council (2023) Town Centre Audit	Measuring the health of town centres via town centre uses and vacancies.	No link as yet
PMRS (annual up to 2022) Town Centre Footfall data	On street footfall counts in the 6 town centres to help	Graph? Thematic maps

	assess the health of the centres.	
East Lothian Council (2023) Vacant and Derelict land	Identification of land which is vacant or derelict and may present opportunities for new uses.	Maps?
Scottish Retail Consortium	National trend data for retailing and town centres	www.brc.org.uk/src/
East Lothian Local Economy Strategy 2023 (draft)	Updates and replaces the EDS to provide the most up to date Local Economy Strategy for East Lothian.	Currently in draft form pending publication January 2024.

SUMMARY OF EVIDENCE

Town Centre Hierarchy

Currently there are 6 main town centres and 17 local centres in East Lothian (with further neighbourhood centres planned amidst new residential developments, including Blindwells). The Local Development Plan 2018 established this hierarchy of town and local centres. There are currently no designated Commercial Centres. Town Centre strategies were prepared as Supplementary Guidance for the six main town centres. It is noted that Scottish Government (2023) *Local Development Planning Guidance*, suggests that Planning Authorities should develop Town Centre Strategies for each centre included in their network, to enhance their vibrancy. Under current LDP policy, there is no distinction between town centres and local centres with respect to the sequential approach – both are classed as tier 1 priority (Policy TC1). Furthermore, there is no restriction on the number or geographical distribution of non-retail commercial uses in town centres. This was intentional, to ensure the centre's continued vibrancy, vitality and viability. This in itself helps support the East Lothian strategies aimed at tackling the climate emergency and reducing the need to travel. NPF4 requires LDPs to *identify a network of centres that reflect the principles of 20 minute neighbourhoods and the town centre vision.*

Ryden (2021) considered the current hierarchy and size of each town centre. The following conclusions were reached; consideration should be given to allocating a few, small commercial centres in East Lothian, where retail uses predominate. There needs to be at least three retailers present and of a scale to serve the entire catchment hinterland in which they are located. Commercial centres are low on the hierarchy of preference under sequential test and do not need planning policy protection to the extent of town centres and local centres – possibly allocate at Gateside (Haddington), Olivebank (Musselburgh) and Spott Road (Dunbar). It is worth reconsidering any other predominantly retail concentrations, that may warrant reallocation as Commercial Centres, examples include those at Mid Road, Prestonpans and Whittinghame Drive, Haddington – currently designated as employment sites, but primarily in retail use.

Ryden (2021) conclude that most of the town centre boundaries in the East Lothian LDP are appropriate as they conform with guidance and aim to include a variety of uses, especially those generating significant footfall. However, while the boundaries encompass a wide variety of uses, including, for example, education and leisure, they do not give much focus on opportunities to concentrate retail and non-retail commercial service uses together in primary pitches. The advantage of establishing 'core commercial frontage areas' is that shoppers and visitors are presented with the town's retail and non-retail service offer in a relatively small area providing most choice of goods and services assisted by increased generation of footfall. Ryden (2021) note there is scope for the Council to consider future adjustment to the boundaries of two of the town centres; or introduction of core commercial frontages:

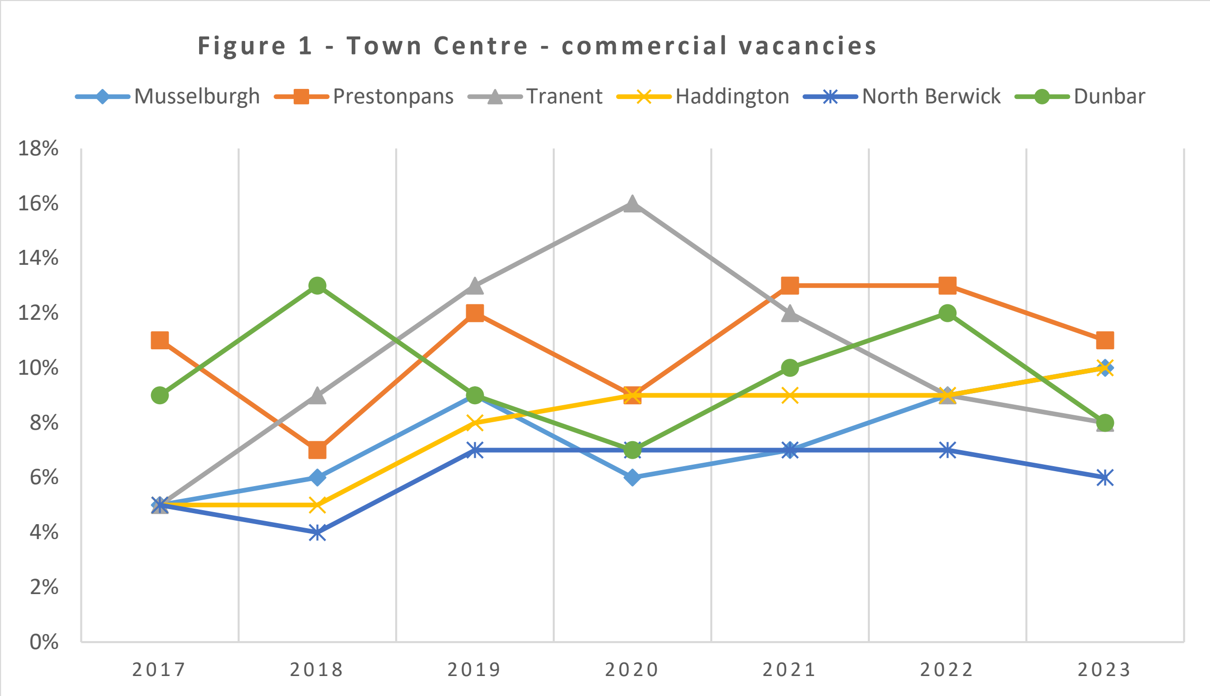
- Musselburgh – truncate the town centre at Bridge St/North High St – or core commercial frontage on High Street
- Prestonpans – Core commercial frontage on High Street - the defined town centre is linear, with limited retailing interspersed amongst mainly housing, take-aways and other services.

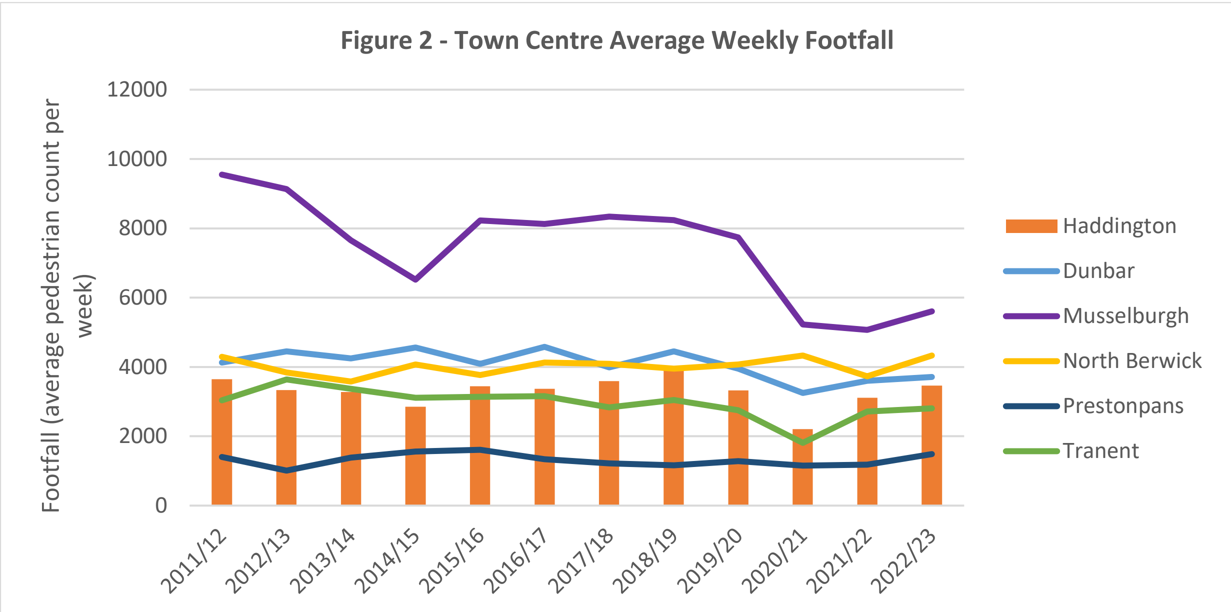
Health of town centres

Most East Lothian towns have and will continue to experience population growth**.** Currently (as of survey, April 2023) East Lothian has below national average vacancy rates for all 6 of the main town centres. The retail vacancy rate across Scotland is an average of 15.7% (The Scottish Retail Consortium, 2023). Vacancy rates are highest in shopping centres, with town centre vacancies across Scotland at 14.8% currently. Figure 1 presents yearly recorded vacancy rates since 2017, across the 6 East Lothian town centres.

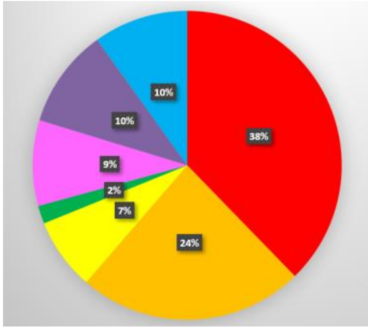
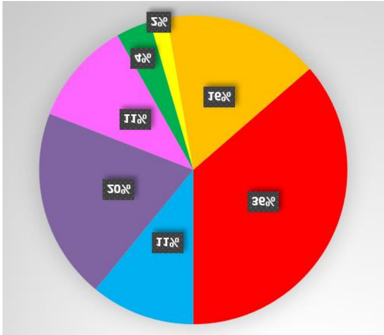
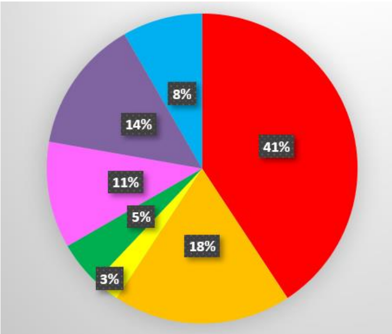
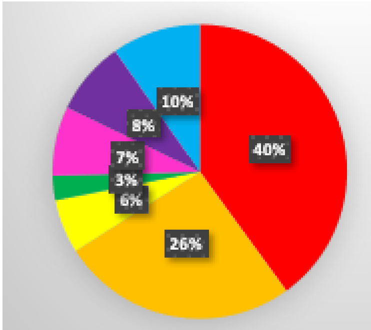
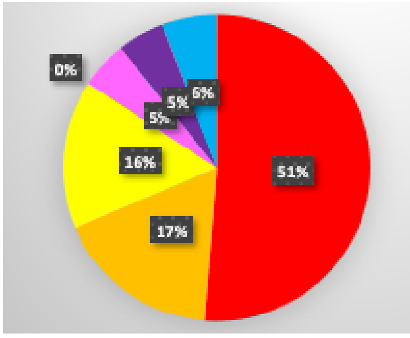
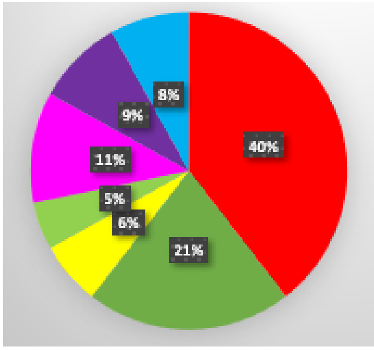
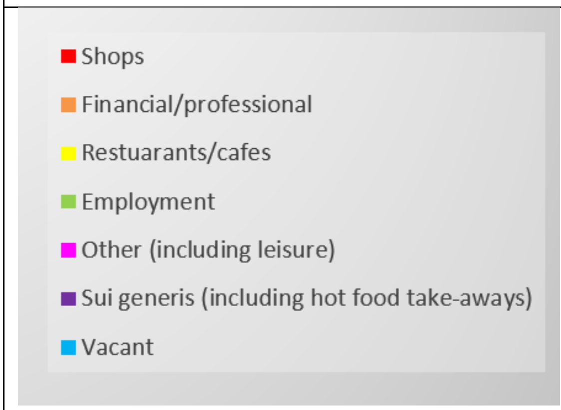
There have been some recent changes since the April 2023 survey, such as the closure of the large M&Co units in Haddington and Musselburgh, but both have already been filled, only a few months later. There are some very recent closures in Tranent e.g Farmfoods and Bisset and Steadman – two units which make quite an impact on the centre. Farmfoods has now been filled by Costcutter. However, overall the town centres are performing above the national average, and this has been a consistent picture for some time.

The Covid pandemic did not appear to affect vacancy rates in East Lothian town centres, however, footfall did decline, but is now rising again (Figure 2). National retail trends indicate the probability that shoppers will visit fewer centres in the future and weaker parts of town centres are unlikely to meet future market demand. The trend is for shoppers to visit the largest centres, malls and retail parks, combined with higher levels of online shopping (Ryden, 2021).





Policy in the current East Lothian Local Development Plan (2018) permits most commercial uses anywhere within the defined town and local centre boundaries e.g shops, offices, leisure, hot food etc. In all six town centres the greatest number of units fall within Class 1, shop use (recently changed to Class 1A). Some centres have significant number of units in sui generis, these can include hot food take-aways. The use classes in each centre are shown below, as of 2023. There are concentrations of some uses, in some centres. NPF4 requires LDPs to *be informed by evidence on where clustering of non-retail uses may be adversely impacting on the wellbeing of communities.* It should be noted that the Use Classes order was amended in 2023, and Class 1A now combines previous class 1 and class 2 uses.

MUSSELBURGH	PRESTONPANS
	
TRANENT	HADDINGTON
	
NORTH BERWICK	DUNBAR
	
	

Some centres host concentrations of hot food takeaways or other sui generis uses, such as book makers, often these are within the central shopping area, and often these are in our more disadvantaged areas – such as Tranent and Prestonpans, some are close to schools e.g

Tranent. There are also a significant number of Class 3 uses in some centres. This can provide mix and vibrancy, but can erode the retail offer and impact community well being.

Site opportunities for significant new retail in the 6 town centres are very limited. The Council's survey of vacant and derelict land identifies only three town centre sites in East Lothian; two in Tranent and one in Prestonpans. One of the sites (former Fa'side Lodge, Tranent) has planning permission for 24 flats and 4 houses. The former Tranent infant school is expected to come forward for residential development shortly. In Prestonpans Harlow Hill House is vacant. It is Listed and sits within a defined local garden and design landscape, the intention is for restoration and conversion to largely residential use. Although population is expanding through residential development, trends in retailing are that online shopping will increase (Ryden, 2021). Increased population no longer equates to a need for additional floorspace – see section on retail capacity below.

Health and well-being

NPF4 states that *LDPs should identify areas where proposals for healthy food and drink outlets can be supported*.

As noted above, concentrations of certain uses are found within some East Lothian town centres. It can be surmised that some concentrations e.g shops selling 'unhealthy' foods in close proximity to schools, can be harmful to the well being of the community. However, there is no data available in East Lothian at the town centre level to allow for quantitative correlation. This is something that will be sought going forward, through collaborative working with the NHS.

Furthermore, LDPs can consider the diversity and availability of food through retail and how it is or is not contributing towards healthy diet and weight in the area. This is something to be considered for the development of policy and settlement strategies in the Proposed Plan. *LDPs may help address food deserts by identifying areas with an absence or very low level of outlets for nutritious, healthier food, and then identifying locations where outlets selling nutritious, healthier food and drink would be supported* (Scottish Government - Local Development Planning Guidance, 2023).

Future retail capacity

Ryden (2021) identify that population growth of nearly 9% over the next ten years is forecast in East Lothian. The greatest population growth will be in Musselburgh and Prestonpans areas. The research has highlighted that levels of online shopping are progressively becoming much higher compared to the past.

The 2021 Retail Capacity Study, undertaken for East Lothian considers the retail market and an assessment of forecast spare retail expenditure capacity up to 2030 to support the development of new retail floorspace in East Lothian. NPF4 requires LDPs to *consider where there may be a need for further retail provision.*

Convenience expenditure inflows in East Lothian are low (5%) and outflows are also fairly low (15%). The area is therefore quite self sufficient. Convenience expenditure per capita is projected to decline slightly over the next 10 years, but projected population expansion results in a small addition to total expenditure by residents up to 2030. The forecast spare convenience expenditure capacity to 2030 ranges from **none to £10 million** (which is not large). It would support a notional **additional 700 sq m net of convenience floorspace**. The proposed new local centres, still to come to fruition, including Blindwells, will be capable of being serviced by forecast convenience expenditure. Over and above this, scope for servicing additional new convenience floorspace will mostly be in the form of trade diversion from existing stores - only suitable where this would improve the quality, range and choice of convenience stores generally.

Comparison expenditure inflows to East Lothian are very low (7%), but outflows are very high (70%). There is little prospect of reducing this level of leakage because of the proximity to major shopping facilities in Edinburgh (Ryden, 2021). Comparison expenditure is projected to rise. Forecast spare expenditure capacity in East Lothian to 2030 is within the range of **£18 million to nearly $44 million**. This could support between **3500 – 7400 sq m net of comparison retail floorspace**. The high end of the range may not be achieved as it is likely that comparison expenditure leakage from East Lothian will increase in line with the market trends, where shoppers are likely to be drawn to fewer, larger centres in the future, including to the new St James Quarter, Edinburgh. East Lothian does not have any large centres. The achievable range of spare comparison expenditure may be mid-way between the high and low forecasts. Even so, realisation of this potential will depend on provision of an attractive and continually improving offer from retailers in East Lothian. Without this, expenditure leakage will almost certainly increase further and there will be more online spending. Options that could support a much higher level of comparison retail floorspace would have to be capable of attracting significant new trade plus claw back of expenditure leakage. This will be challenging in view of the national retail trends.

NPF4 requires *LDPs to consider, and if appropriate, identify any areas where drive-through facilities may be acceptable where they would not negatively impact on the principles of local living or sustainable travel.* There are currently three drive through facilities in East Lothian, built and operating, and a further four units with planning permission in place. Geographically these are spread across East Lothian with two in Dunbar, two in Haddington, two at A1 roadside (outside Macmerry) one on the edge of Musselburgh (A1 roadside).

The table below identifies current drive through facilities and recent planning applications, including refusals. If all consents are built out, the number of drive-through facilities in East Lothian will more than double from the current position. Whilst all current and planned drive-throughs are either within a settlement or planned as part of A1 roadside services, all are in out of centre locations, with the exception of McDonalds at Dunbar, which forms part of a defined Local centre.

Future market demand will be tested through a Call for Sites process in 2024 and consideration will be given to any proposed drive-through locations with a particular focus on impacts and effects on the existing road network, the climate emergency, the existing retail offer and distribution and compatibility of drive throughs with the wider area. Consideration will also be given to the fact that East Lothian sits in close proximity to drive-through facilities at the east end of Edinburgh (Mcdonalds and KFC at Fort Kinnaird, Costa at

Brunstane) and Dunbar is only 27 miles from drive-through facilities at Berwick upon Tweed. As mentioned earlier, town centre development sites are limited. Consideration must also be given to the health and well-being of local communities with awareness to the offer of healthy food and drink in the district and on sale within the town and local centres, particularly those centres, and locations, within close proximity to schools.

Brand	**Location**	**Town/local/edge/out of centre**	**If out of centre, within settlement or rural area**	**Current status**
Mcdonalds	Spott Road, Dunbar	Local		built
Costa	Gateside, Haddington	Out of centre	Settlement	built
Starbucks	Gateside, Haddington	Out of centre	Settlement	Built
P.P granted for class 3 drive through – Nov 22	Spott Road, Dunbar	Out of centre	Settlement	Live consent
Class 3 drive through – July 2021. Part of roadside services.	Old Craighall Service area, off A1	Out of centre	Rural	Live consent
P.P granted for 2x class 3 drive throughs as part of roadside service scheme - Dec 2019	Gladsmuir junction, off A1	Out of centre	Rural	Development initiated - sept 22 Live consent
Class 3 drive through - refused July 2021	Edinburgh Road, Musselburgh	Out of centre	Settlement	p.p refused
Class 3 drive through – refused Oct 2020. Appeal dismissed.	Olivebank Road, Musselburgh @Tesco	town	Settlement	p.p refused

Residential in town centres

In the current LDP, residential use in a town or local centres is only acceptable in backland or above ground floor locations and new buildings are expected to reflect the prevailing vertical mix of land uses in the area by providing town or local centre uses at the ground floor where this is appropriate in their context.

NPF4 requires LDPs to *provide a proportion of their Local Housing Land Requirements in city and town centres and be proactive in identifying opportunities to support residential development.* East Lothian's town centres are small, residential use is currently encouraged, but not within the main shopping areas. All 6 town centres serve a residential hinterland, much of which is accessible within 20 minutes. Where there is capacity or opportunities to develop new housing and flats without compromising active use of ground floors and public spaces, this has been supported. Currently there are only 3 sites within the 6 town centres on the Council's latest survey of vacant and derelict land; one in Tranent now has the benefit of planning permission for 28 dwellings (Former Fa'side Lodge), leaving just two vacant buildings; both expected to come forward for residential in future.

Given the scale of East Lothians town centres there will be limited opportunity for new residential development within town centres and it will not be possible to develop a requirement for the provision of land in these areas. Policy will continue to allow development in suitable town centre locations but not at the expense of retail provision.

SUMMARY OF STAKEHOLDER CONSULTATION – key issues raised

During 2023 extensive engagement took place with key agencies, specific groups, businesses and the general public. The Summary of Evidence Report Engagement (Document 027) details this process and the comments received. Key comments received with respect to town centres and retailing are highlighted below:

General Public

A general public consultation ran between June and September 2023, with online storyboard, questionnaire and Place Standard, with in person events in each of the 6 towns in June 2023. The key issues raised were:

- Strong support 77% for existing town centres and that land should NOT be allocated for further out of town non food retail 86% of respondents want no new out-of-town retail development, reasons given:
  - There is sufficient retail space
  - Close enough to Edinburgh's out of town centres
  - Need to regenerate town centres and integrate new development
  - Any development would end up being car-centric
  - Would undermine the viability of non-food shops in town centres
  - Less demand now as more online shopping
  - Duplication of buildings and infrastructure
  - most of the economic value of large businesses (the ones in retail parks) does not stay in East Lothian
  - Would reduce footfall in our towns
  - Loss of agricultural land
  - East Lothian is too small for large operators
  - Strong support 76% for restricting some uses in town centres, with most support for restricting:
  - Hot food take-aways
  - Bookmakers

Children and Young People

Through engagement with children and young people, the following issues were identified, with relevance to town centres and retailing:

<u>Secondary aged young people</u>:

13% of secondary age children like hanging out in the town centres and 13% at out-of-town shopping areas. This was also noted using the Place Standard tool in Knox Academy (Haddington). 8% of respondents like to go shopping as an out of school past time.

Only 9% of respondents feel there are good shops in the area that they live. But 12% think there is a good choice of place to buy food and drink. In particular, 'good shops' are a highlight in Dunbar and 'good choice of places to buy food and drink' are a highlight in Tranent.

25% of pupils buy their lunch from a shop or high street local to their school, with 20% accessing the high street or local shops in their lunchbreak. Unfortunately the majority favour purchasing less healthy food (72% buying fast food, crisps, sweets or juice).

Place Standard – for East Lothian as a whole, young people of secondary school age scored schools, libraries, shops and services as a 5 (better than ok). Scored 5 at Knox Academy (Haddington), Scored 4 at Dunbar Grammar, Scored 5 at North Berwick High, Scored 5 at Rosehill High (Wallyford), Scored 5 at Ross High (Tranent).

Haddington (Knox Academy) - 40% of young people who commented wanted more to do in the town, suggesting improvements to infrastructure and facilities, with larger leisure options being popular – cinema or bowling.

Dunbar (Dunbar Grammar) – the participants chose to discuss the theme of schools, libraries, shops and services in detail. Young people would like to see improvements in the range of shops available in Dunbar. 66% of young people who commented on this theme made suggestions about the kind of shops and activities they would like to see in the town - Cinema, shopping, bowling, gym. "*All the fun stuff is in Edinburgh*".

North Berwick (North Berwick High) - Young people were aware of recent discussions about pedestrianisation of the high street. They reflected on issues of "Too many cars and not enough spaces", however this group were not in favour of pedestrianisation as they thought it might limit access for older people.

Wallyford (Rosehill High) - Discussion ranged within this theme from access to doctors appointments to the need for more amenities within the community, particularly shops, library and sports clubs.

Tranent (Ross High) – there was no specific discussion of town centres or shops in Tranent, however, issues such as safety were deemed very important.

Primary aged young people:

Children like having sports facilities, parks, school, shops and community centres close by. Not having to drive to these facilities is important. They would like to see a variety of shops and cafes.

"I like that I don't need to drive to go to shops, friends and school." Child at Longniddry Primary School"

"[I'd like] lots of shops and safe places to play. Not much cars and roads around and it's not busy." Child at Stoneyhill Primary School

"We need more facilities such as shops, swimming pools, sports centres, parks and car parks." Child at Longniddry Primary School

Children described the impact of new houses on traffic and local facilities and the need for an accompanying increase in local facilities.

Cockenzie – the children enjoy living here as they have parks, friends, shops near by. "There's nice places to go, like walk your dog and shops"

Aberlady wish list - A chippy, restaurant and coffee shop, more shops

Sanderson's Wynd, Tranent – children tell us that having shops, parks and sports facilities that are easy to get to, are important for them. Children enjoy playing out in the street with friends and also going up the street to the shops. Wish list – a cleaner high street with more shops and restaurants, a swimming pool and sports facilities.

St Martin's, Tranent – "high street more clean, less trash", "more shops, restaurants and take aways", "more shops in local areas without really busy roads"

St Mary's, Haddington – Children would like a cleaner town, with less litter. More shops in East Lothian instead of having to go to Edinburgh.

Stoneyhill, Musselburgh – "people need fruit and stuff instead of junk" – give them bigger gardens to grow food.

Whitecraig – "we need more shops so there's a variety of different stuff and also so you don't have to travel so far to get things"

Longniddry "the village has a community centre with a library and clubs that lots of children go to"

WHAT THIS MEANS FOR THE PROPOSED PLAN

Evidence	Proposed Plan considerations
The existing town centre boundaries encompass a wide range of town centre uses, however without defined core commercial frontages, the retail offer in some centres is quite dispersed e.g. Musselburgh and Prestonpans. Furthermore, this can lead to clustering of non shop uses within core areas – see below. Young people are particularly keen to see improvements in the shops in their area with only 13% of respondents believing there are good shops in the area that they live. Primary age children are keen to see more shops and variety in their local areas. Commercial centres are low on the hierarchy of preference under sequential test and do not need planning policy protection to the extent of town centres and local centres – the Ryden (2021) study suggested allocation at Gateside (Haddington), Olivebank (Musselburgh) and Spott Road (Dunbar). These are currently Local Centres, afforded the same level of protection as town centres, under current LDP policy. There are other concentrations of retail uses, currently identified as employment sites.	Retain town centre boundaries to include and encourage a wide range of uses. Consider the introduction of core commercial frontages to each town centre (primarily permitting use classes 1,2 and 3). Identify commercial centres (out of /edge of town) – these will sit lower in sequential approach.
Vacancy rates remain stable, footfall is increasing since the pandemic, but some centres have concentrations of non shopping uses both within the central commercial areas, and sometimes close to schools. Public engagement saw strong support for the restriction of some uses, primarily hot food take-aways and bookmakers (there is support for restriction in Policy 27 of NPF4). We have found through our survey, that a large proportion of those secondary aged children utilising the	Consider introduction of Core commercial areas (see above) Restrict non retail uses where clustering is impacting the well-being of the

high street or local shops for lunch, are buying less healthy foods/drinks (72%).	community – links with above. Identify areas where proposals for healthy food and drink outlets can be supported.
Very little spare convenience expenditure forecast to 2030. Planned local centres, including at Blindwells, can accommodate this spare expenditure. There are few site opportunities within existing town centres. 86% of adult respondents to recent engagement want no new out-of-town retail development. Children too like having shopping facilities close by.	Limited town centre opportunities for new retail development, there is limited surplus convenience expenditure. Focus on regeneration and improvement (including green infrastructure), including redevelopment where appropriate – within town centre boundaries. No new food retail outside of defined centres, except neighbourhood shops.
There is significant spare retail comparison expenditure to 2030, plus leakage to outside of East Lothian is currently very high (70%). However, there are no large town centre opportunity sites and 86% of adult respondents to recent engagement want no new out-of-town retail development. Only 9% of young people felt there were 'good shops' in their area. There is scope to address the spare expenditure and 'claw back' - "*All the fun stuff is in Edinburgh*" (Young person, Dunbar)	Ensuring a continued programme of maintenance and improvement to the town centres in East Lothian is the best route to support retailing and services in these centres. Regeneration and redevelopment, should funding and opportunities arise, should be primarily focused within existing town centre boundaries. Call for sites will present market demand and assessment will be required on any retail sites and sites promoted for drive-through facilities.

AREAS WHERE THERE IS AGREEMENT OR DISPUTE ON ISSUES AND POSSIBLE APPROACHES

There is significant public support for no new out of town retail in East Lothian – this correlates with the findings of the Retail Capacity Study. There is also strong support for restricting some uses within town centres, our own evidence demonstrates some accumulations and geographical concentrations of some less desirable uses, such as hot food takeaways and bookmakers. A large proportion of children that responded are purchasing less healthy foods during their lunch break.

However, children and young people would like to see a greater variety of shops and leisure facilities, reducing the need to travel further afield (supporting the climate agenda) and there is scope for claw back on comparison expenditure, as identified in the Retail Capacity Study. Unfortunately, there are limited sites for development within the existing town centres.

There were no disputes raised by Key Agencies on town centres and retailing.